

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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STEVEN GOLDSTEIN, on Behalf of Himself	:	Civil Action No: 07 Civ. 11158(UA)
and a Class of Persons Similarly Situated,	:	
	:	
Plaintiff,	:	
v.	:	
	:	
CITIGROUP, INC., THE PLANS	:	
ADMINISTRATION COMMITTEE OF	:	
CITIGROUP, INC, MICHAEL E. SCHLEIN,	:	
CHARLES PRINCE, C. MICHAEL	:	
ARMSTRONG; ALAIN J.P. BELDA; GEORGE	:	
DAVID; KENNETH T. DERR; JOHN M.	:	
DEUTCH;ROBERTO HERNÁNDEZ RAMÍREZ;	:	
ANDREW N. LIVERIS; ANNE MULCAHY;	:	
RICHARD D. PARSONS; JUDITH RODIN;	:	
ROBERT E. RUBIN; ROBERT L. RYAN; AND	:	
FRANKLIN A. THOMAS, and JOHN DOES 1-30,	:	
	:	
Defendants.	:	
	:	
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STEPHEN GRAY, individually and on behalf of all	:	Civil Action No: 07 Civ. 9790
others similarly situated,	:	(SHS) (DCF)
	:	
Plaintiff,	:	
v.	:	
	:	
CITIGROUP, INC., CHARLES PRINCE, THE	:	
PLANS ADMINISTRATIVE COMMITTEE OF	:	
CITIGROUP INC., THE 401(K) INVESTMENT	:	
COMMITTEE, and JOHN DOES 1-20,	:	
	:	
Defendants.	:	
	:	
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SHAUN ROSE, Individually and on behalf of all :
others similarly situated, :

Plaintiff, :

v. :

CITIGROUP, INC., CHARLES PRINCE, THE :
PLANS ADMINISTRATIVE COMMITTEE OF :
CITIGROUP INC., THE 401(K) INVESTMENT :
COMMITTEE, and JOHN DOES 1-10, :

Defendants. :

Civil Action No: 07 Civ. 10294
(DC)

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MEREDITH TRANBERG, individually and on :
behalf of all others similarly situated, :

Plaintiff, :

v. :

CITIGROUP, INC., CHARLES PRINCE, THE :
PLANS ADMINISTRATIVE COMMITTEE OF :
CITIGROUP INC., THE 401(K) INVESTMENT :
COMMITTEE, and JOHN DOES 1-20, :

Defendants. :

Civil Action No: 07 Civ. 10341
(UA)

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ANTON RAPPOLD, individually and on behalf of :
all others similarly situated, :

Plaintiff, :

v. :

CITIGROUP, INC., CITIBANK, N.A., CHARLES :
PRINCE, THE PLAN ADMINISTRATIVE :
COMMITTEE OF CITIGROUP INC., THE 401(K):
INVESTMENT COMMITTEE, and JOHN and :
JANE DOES 1-10, :

Defendants. :

Civil Action No: 07 Civ. 10396
(UA)

SAM TADROS, on Behalf of All Others Similarly Situated,

Plaintiff,

V.

CITIGROUP, INC., CHARLES O. PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, ROBERTO HERNANDEZ RAMIREZ, ANN DIBBLE JORDAN, KLAUS KLEINFELD, ANDREW N. LIVERIS, ANNE MULCAHY; RICHARD D. PARSONS; JUDITH RODIN; ROBERT E. RUBIN; ROBERT L. RYAN, FRANKLIN A. THOMAS, JOHN DOES 1-20 (BEING CURRENT AND FORMER MEMBERS OF THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC.) and JOHN DOES 21-40 (BEING CURRENT AND FORMER MEMBERS OF THE INVESTMENT COMMITTEE OF THE CITIGROUP INC. 401(K) PLAN),

Defendants.

Civil Action No: 07 Civ. 10442
(UA)

STEPHAN FIORINO, individually and on behalf
of all others similarly situated,

Plaintiff,

V.

CITIGROUP, INC., CITIBANK, N.A., CHARLES PRINCE, THE PLAN ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(K) INVESTMENT COMMITTEE, and JOHN DOES 1-20,

Defendants.

Civil Action No: 07 Civ. 10458
(UA)

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JAMES BOLLA, individually and on behalf of all : Civil Action No: 07 Civ. 10461
others similarly situated, : (UA)
:

Plaintiff, :

v. :

CITIGROUP, INC., CITIBANK, N.A., CHARLES :
PRINCE, THE PLAN ADMINISTRATIVE :
COMMITTEE OF CITIGROUP INC., THE 401(K):
INVESTMENT COMMITTEE, and JOHN DOES :
1-20, :

Defendants. :

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MARK GEROULO, individually on behalf of : Civil Action No: 07 Civ. 10472
Citigroup 401(K) Plan, the Citibuilder 401(K) Plan : (UA)
for Puerto Rico, and all others similarly situated, :

Plaintiff, :

v. :

CITIGROUP, INC., CITIBANK, N.A., THE PLAN :
ADMINISTRATIVE COMMITTEE OF :
CITIGROUP, INC., MICHAEL E. SCHLEIN, :
JOHN DOES 1-10, THE CITIGROUP 401(k) :
PLAN INVESTMENT COMMITTEE and JOHN :
DOES 10-20, C. MICHAEL ARMSTRONG, :
ALAIN J.P. BELDA, GEORGE DAVID, :
KENNETH T. DERR, JOHN M. DEUTCH, :
ROBERTO HERNÁNDEZ, ANN DIBBLE :
JORDAN, ANDREW LIVERIS, DUDLEY C. :
MECUM, ANNE M. MULCAHY, RICHARD D. :
PARSONS, ANDRALL E. PEARSON, CHARLES :
PRINCE, JUDITH RODIN, ROBERT E. RUBIN, :
FRANKLIN A. THOMAS, SANFORD I WEILL :

Defendants. :

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**NOTICE OF MOTION AND MOTION BY STEVEN GOLDSTEIN
FOR CONSOLIDATION OF ALL RELATED ACTIONS AND
APPOINTMENT OF INTERIM LEAD PLAINTIFF AND LEAD COUNSEL**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on December 20, 2007 at 10:00 a.m., or as soon thereafter as the matter may be heard, Steven Goldstein, plaintiff in *Goldstein v. Citigroup Inc. et. al.*, No. 07-cv-11158 (UA) (the “Goldstein Action”), will move this Court for an order: (i) consolidating all related ERISA actions in this district against Citigroup Inc. (“Citigroup”); (ii) appointing Steven Goldstein as the interim lead plaintiff on behalf of a proposed class of participants and beneficiaries (the “Participants”) of the Citigroup 401(k) Plan and the Citibuilder 401(k) Plan for Puerto Rico (hereinafter referred to as the “Plans”) in the consolidated action; and (3) appointing his counsel, Stull, Stull & Brody (“SSB”), as interim lead counsel for the proposed class in the consolidated action. This Motion is made pursuant to Fed. R. Civ. P. 23(g) and 42(a) and the Manual for Complex Litigation-Fourth (2005).

This Motion is based on the accompanying Memorandum of Points and Authorities in support thereof and the Declaration of Edwin J. Mills filed herewith.

Dated: December 11, 2007

STULL, STULL & BRODY

By: s/ Edwin J. Mills
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**Counsel for Plaintiff Steven Goldstein
and Proposed Interim Lead Counsel for
the Class**